JS 44 (Rev. 02/19)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS				DEFENDANTS	3				
380 Red Lion Road Asso	ociates LP			Windsor-Mount Jo	y Mutual	Insurance Cor	mpany		
(b) County of Residence (E	of First Listed Plaintiff CXCEPT IN U.S. PLAINTIFF C.	Bucks County, PA ASES)		County of Residence NOTE: IN LAND COUNTRY THE TRACT	(IN U.S. P.	ed Defendant LAINTIFF CASES OF CASES, USE TO IVOLVED.	,		PA
(c) Attorneys (Firm Name, Joseph A. Zenstein, Esq 1240 Old York Road, Su 215-230-0800 / jzensteir	uire ite 101, Warminster, F			Attorneys (If Known)	1				
II. BASIS OF JURISD	ICTION (Place an "X" in C	One Box Only)	III. CI	TIZENSHIP OF P	PRINCIPA	L PARTIES	(Place an "X" in	One Box	for Plaintiff
U.S. Government Plaintiff	3 Federal Question (U.S. Government)			(For Diversity Cases Only) P	TF DEF	Incorporated or Proof Business In T	and One Box f		
☐ 2 U.S. Government Defendant	☐ 4 Diversity (Indicate Citizensh	ip of Parties in Item III)	Citiz	en of Another State] 2	Incorporated and I of Business In		5	5
IV. NATURE OF SUIT	F (2) (470) (2) (3)			en or Subject of a reign Country	***	Foreign Nation		□ 6	□ 6
CONTRACT		nty) DRTS	FC	DEFITIOE/DENALTY		here for: Nature			
110 Insurance 120 Marine 130 Marine 140 Negotiable Instrument 150 Recovery of Overpayment & Enforcement of Judgment 151 Medicare Act 152 Recovery of Defaulted Student Loans (Excludes Veterans) 153 Recovery of Overpayment of Veteran's Benefits 160 Stockholders' Suits 190 Other Contract 195 Contract Product Liability 196 Franchise 196 Franchise 210 Land Condemnation 220 Foreclosure 230 Rent Lease & Ejectment 240 Torts to Land 245 Tort Product Liability 290 All Other Real Property	PERSONAL INJURY 310 Airplane 315 Airplane Product Liability 320 Assault, Libel &	PERSONAL INJUR 365 Personal Injury - Product Liability 367 Health Care/ Pharmaceutical Personal Injury Product Liability 368 Asbestos Personal Injury Product Liability PERSONAL PROPER 370 Other Fraud 371 Truth in Lending 380 Other Personal Property Damage Product Liability PRISONER PETITION Habeas Corpus: 463 Alien Detainee 510 Motions to Vacate Sentence 530 General 535 Death Penalty Other:	X	DRFEITURE/PENALTY 5 Drug Related Seizure of Property 21 USC 881 60 Other LABOR 0 Fair Labor Standards Act 0 Labor/Management Relations 10 Railway Labor Act 11 Family and Medical Leave Act 10 Other Labor Litigation 11 Employee Retirement Income Security Act IMMIGRATION 2 Naturalization Application 5 Other Immigration Actions	422 Appe 423 With 28 U	SC 157 RTY RIGHTS rights tt tt - Abbreviated Drug Application emark SECURITY (1395ff) k Lung (923) c/DIWW (405(g)) Title XVI 405(g)) AL TAX SUITS s (U.S. Plaintiff efendant)	375 False C 376 Qui Tar 3729(a) 400 State Re 410 Antitrus 430 Banks a 450 Comme 460 Deporta 470 Rackete Corrupt 480 Consum 485 Telepho 485 Telepho 850 Securiti Exchan 890 Other S 891 Agricult 835 Environ 895 Freedom 895 Freedom 896 Arbitrat 896 Arbitrat 896 Arbitrat 899 Adminis Act/Rev	n (31 USC)) apportions of the many states of the m	ment ag ced and cions mer odities/ ctions atters nation ocedure peal of
	moved from 3 te Court Cite the U.S. Civil Sta	Appellate Court stute under which you ar surance Act of 1968	re filing (1	pened Another (specify	er District	☐ 6 Multidist Litigation Transfer versity):	1 -	Multidis Litigatic Direct Fi	on -
VII. REQUESTED IN COMPLAINT:		IS A CLASS ACTION) D	EMAND \$		HECK YES only		complai	
VIII. RELATED CASE IF ANY	(See instructions):	JUDGE			DOCKE	T NUMBER _			
DATE OG/18/2019 FOR OFFICE USE ONLY		SIGNATURE OF THE	TORNEY C	OF RECORD					
	10UNT	APPLYING IFP		JUDGE		MAG. JUI	OGE		

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

380 RED LION ROAD ASSOCIATES LP

380 Red Lion Road

Huntington Valley, PA 19006

CIVIL ACTION

v. : NO.:

WINDSOR-MOUNT JOY MUTUAL INSURANCE COMPANY 21 West Main Street Ephrata, PA 17522

CIVIL ACTION COMPLAINT

I. PARTIES

- 1. Plaintiff, 380 Red Lion Road Associates LP, is a limited partnership located at the address set forth above.
- 2. Defendant, Windsor-Mount Joy Mutual Insurance Company, is a corporation duly organized and existing which is licensed to issue policies of flood insurance pursuant to the National Flood Insurance Act of 1968, 42 U.S.C. §4001 et seq. and which did issue a flood policy, policy number 26166050422017, covering Plaintiff's premises located at 380 Red Lion Road, Huntington Valley, PA 19006. Plaintiff is not in possession of the entire policy and it is alleged that said policy is in the possession of Defendant.
- 3. At all times material hereto, Defendant was acting either individually or through its duly authorized agents, servants, workmen or employees who were acting within the course and scope of their employment and on the business of said employer.

II. JURISDICTION

4. Original exclusive jurisdiction is conferred upon this Court pursuant to the National Flood Insurance Act of 1968, 42 U.S.C. §4001 et seq.

III. CAUSE OF ACTION AND DAMAGES AND RELIEF REQUESTED

- 5. On or about September 25, 2018, while the aforementioned flood policy of insurance was in full force and effect, Plaintiff suffered sudden and accidental direct physical losses by flood resulting in serious damage to the insured premises to the extent set forth in the Estimate of Hillis Adjustment Agency Inc., a true and correct copy of which is attached hereto, made part hereof, and marked as Exhibit "A".
- 6. Notice of Plaintiff's covered loss was given to Defendant in a timely manner and Plaintiff has done and otherwise performed all things required of Plaintiff under the policy of insurance issued by Defendant.
- 7. Defendant, despite demand for benefits under its policy of insurance has failed and refused to pay Plaintiff those benefits due and owing under said policy of insurance.
- 8. Defendant has breached its contractual obligation to pay benefits to Plaintiffs for a loss covered under Defendant's policy of insurance.
- 9. Solely as a result of Defendant's failure and refusal to pay benefits to Plaintiff as required under the aforementioned policy of insurance, Plaintiff has suffered loss and damage in an amount in excess of \$150.000.00.

WHEREFORE, Plaintiffs demand judgment against Defendant in an amount in excess of \$150,000.00 together with costs, damages for delay, attorney fees and expenses pursuant to 28 U.S.C. § 2412 and such other remedies as seen fit by this Court.

CLAIMS WORLDWIDE LLC

BY:

JOSEPHA. ZENTEIN, ESQUIRE

Jzenstein@zensteinlaw.com 1240 Old York Road, Suite 101

Warminster, PA 18974

215-230-0800 215-230-0810

Attorney for Plaintiff

Date: June 19, 2019



Corporate Headquarters

2336 Street Road, Bensalem, PA 19020 E-mail: info@hillispublicadjusters.com Tel: +1-800-445-5471 (1-800-HILLIS-1)

Fax: +215-245-7101 Web: www.hillis1.com

Insured: ROSESTONE LLC Property: 380 RED LION RD

HUNTINGDON VALLEY, PA 19006-6451

Claim Rep.: Don Martin

Company: Hillis Adjustment Agency Inc.

Estimator: Don Martin Company:

Hillis Adjustment Agency Inc.

E-mail: dmartin@hillispublicadjusters .com

E-mail:

dmartin@hillispublicadjusters.com

Claim Number: **Policy Number: 2616625042** Type of Loss: Flood

Date of Loss:

9/25/2018

Date Received:

Date Inspected:

Date Entered: 10/10/2018 9:16 AM

Price List: PAPH8X OCT18

Restoration/Service/Remodel

Estimate: 180629_CHAWLA_HILLIS

Net Claim Summary

Coverage		Net Claim
Building		\$289,444.35
	Total Net Claim	\$289,444.35
	Total Amount of Building Recoverable Depreciation	\$0.00
	Total Net Claim if Depreciation is Recovered	\$289,444.35



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Claim Number: Policy Number: 2616625042 Type of Loss: Flood

Date of Loss: 9/25/2018 Date Received:

Date Inspected: Date Entered: 10/10/2018 9:16 AM

Price List: PAPH8X_OCT18

Estimate:

Restoration/Service/Remodel 180629_CHAWLA_HILLIS

Building

Net Claim Summary

Replacement Cost Value	Less Recoverable Depreciation	Less Non-recoverable Depreciation	Actual Cash Value
\$297,071.84	(0.00)	<2,627.49>	\$294,444.35
Less Deductible			(5,000.00)
Net Claim			\$289,444.35
Total Recoverable Depreciation			\$0.00
Net Claim if Depreciation is R	ecovered		\$289,444.35



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Building

180629_CHAWLA_HILLIS

Main Level

Main Level

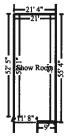
DESCRIPTION	QUANTITY U	INIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
Exterior							
Project scope of work							
Clean with pressure/chemical spray - Very heavy	11,884. SF 75	0.62	457.23	0.00	7,825.78	<0.00>	7,825.78
2. Re-point masonry	2,971.19 SF	4.97	14.26	2,956.22	17,737.29	<0.00>	17,737.29
3. Masonry - Labor Minimum	1.00 EA	165.49	0.00	33.10	198.59	<0.00>	198.59
4. Re-point masonry - block	2,971.19 SF	2.07	8.91	1,231.86	7,391.13	<0.00>	7,391.13
5. Seal block with masonry sealer	2,971.19 SF	0.69	49.92	420.00	2,520.04	<42.00>	2,478.04
6. Waterproof concrete & masonry paint	2,971.19 SF	1.23	94.48	749.82	4,498.86	<74.98>	4,423.88
7. Paint sheet metal - two coats	5,942.38 SF	0.79	106.96	960.30	5,761.74	<0.00>	5,761.74
8. Apply anti-microbial agent to the surface area	1,666.87 SF	0.22	26.24	0.00	392.95	<0.00>	392.95
Total: Main Level			758.00	6,351.30	46,326.38	116.98	46,209.40



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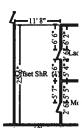
Show Room

Height: 9' 4"

1311.33 SF Walls2468.28 SF Walls & Ceiling128.55 SY Flooring140.50 LF Ceil, Perimeter

1156.94 SF Ceiling 1156.94 SF Floor

140.50 LF Floor Perimeter



Subroom: Offset ShR (1)

Height: 9' 4"

586.44 SF Walls 883.94 SF Walls & Ceiling 33.06 SY Flooring 62.83 LF Ceil. Perimeter

297.50 SF Floor 62.83 LF Floor Perimeter

297.50 SF Ceiling

Missing Wall

11' 8" X 9' 4"

Opens into SHOW_ROOM

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
9. R&R Marble or Granite floor tile	1,454.44 SF	21.86	714.71	6,501.76	39,010.53	<588.79>	38,421.74
10. Remove Additional labor to remove stone from concrete slab	1,454.44 SF	1.80	0.00	523.60	3,141.59	<0.00>	3,141.59
11. Floor leveling cement - Average	1,454.44 SF	2.43	82.90	723.44	4,340.63	<72.35>	4,268.28
12. 1/2" - drywall per LF - up to 2' tall	150.00 LF	6.57	10.62	199.22	1,195.34	<19.92>	1,175.42
13. Tear out wet drywall, cleanup, bag, per LF - up to 2' tall	150.00 LF	2.81	2.79	0.00	424.29	<0.00>	424.29
14. Seal/prime then paint the surface area twice (3 coats)	1,400.00 SF	1.04	21.00	295.40	1,772.40	<29.54>	1,742.86
15. Clean masonry	569.33 SF	0.48	17.12	0.00	290.40	<5.81>	284.59
16. Seal block with masonry sealer	569.33 SF	0.69	9.56	80.48	482.88	<8.05>	474.83
17. Waterproof concrete & masonry paint	569.33 SF	1.23	18.10	143.68	862.06	<14.37>	847.69
18. R&R Steel door, 3' x 7' - fire rated	1.00 EA	450.64	23.82	94.90	569.36	<9.24>	560.12
19. Seal & paint door slab only (per side)	2.00 EA	30.39	0.89	12.34	74.01	<1.24>	72.77
20. R&R Steel door frame - 3' opening	1.00 EA	176.36	6.96	36.66	219.98	<3.35>	216.63
21. R&R Door opening (jamb & casing) - 32"to36"wide - paint grade	2.00 EA	100.80	6.63	41.64	249.87	<3.95>	245.92
22. Seal & paint door/window trim & jamb - (per side)	6.00 EA	24.97	1.56	30.28	181.66	<3.03>	178.63
23. R&R Door - metal - insulated - flush or panel style	1.00 EA	293.13	12.41	61.10	366.64	<5.75>	360.89
24. Seal & paint door slab only (per side)	2.00 EA	30.39	0.89	12.34	74.01	<1.24>	72.77

180629_CHAWLA_HILLIS



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CONTINUED - Show Room

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
25. Lockset - Commercial grade - Detach & reset	2.00 EA	24.53	0.00	9.82	58.88	<0.98>	57.90
26. Contents - move out then reset - Extra large room	4.00 EA	153.59	0.00	122.88	737.24	<12.29>	724.95
27. Muck-out/Flood loss cleanup	1,454.44 SF	1.62	0.00	0.00	2,356.19	<0.00>	2,356.19
28. Air mover (per 24 hour period) - No monitoring	25.00 EA	25.89	46.61	129.46	823.32	<13.73>	809.59

¹¹ air movers for 5 days

Started with 11 air movers on the first day as per FEMA Dry log memo, with decreasing of 50% of the equipment each day of the drying.

The drying time had to be increased due to drying taking longer do to the saturated framing member and sub flooring, and also due to the fact, that extensive porous materials retaining water. We conducted this operation within the IICRC S500 Standards of practice: Institute of Inspection, Cleaning, and Restoration Certification (IICRC).

29. Dehumidifier (per 24 hour period) - No	50.00 EA	52.13	156.39	0.00	2,762.89	<55.26>	2,707.63
monitoring							

10 dehumidifiers for 5 days. (Depend on SF of area and height of area)

The drying time had to be increased due to drying taking longer do to the saturated framing member and sub flooring, and also due to the fact, that extensive porous materials retaining water. We conducted this operation within the IICRC S500 Standards of practice: Institute of Inspection, Cleaning, and Restoration Certification (IICRC).

30. Negative air fan/Air scrubber (24 hr	50.00 DA	71.73	215.19	0.00	3,801.69	<76.03>	3,725.66
period) - No monit.							

10 air scrubbers for 5 days

Using air scrubbers is within the IICRC S500 Standard and Reference Guide for Professional Water Damage Restoration.

The drying time had to be increased due to drying taking longer do to the saturated framing member and sub flooring, and also due to the fact, that extensive porous materials retaining water. We conducted this operation within the IICRC S500 Standards of practice: Institute of Inspection, Cleaning, and Restoration Certification (IICRC).

-							
31. Apply plant-based anti-microbial agent to the floor	1,454.44 SF	0.23	23.77	0.00	358.29	<7.17>	351.12
32. Clean stud wall - Heavy	300.00 SF	0.79	14.60	0.00	251.60	<5.03>	246.57
33. R&R Metal studding, 3 5/8" wide, 16" OC, 14 gauge	948.89 SF	4.68	177.63	923.70	5,542.14	<86.48>	5,455.66
Project scope of work							
-							
34. R&R Commercial electrical (SF of bldg) - Extra heavy load	1,454.44 SF	33.25	686.79	9,809.40	58,856.32	<0.00>	58,856.32
Project scope of work							



Corporate Headquarters

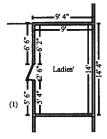
2336 Street Road, Bensalem, PA 19020 E-mail: info@hillispublicadjusters.com Tel: +1-800-445-5471 (1-800-HILLIS-1)

Ladies'

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CONTINUED - Show Room

DESCRIPTION	QUANTITY UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
Totals: Show Room		2,250.94	19,752.10	128,804.21	1,023.60	127,780.61



368.00 SF Walls 494.00 SF Walls & Ceiling

> 14.00 SY Flooring 46.00 LF Ceil. Perimeter

126.00 SF Ceiling126.00 SF Floor46.00 LF Floor Perimeter

Height: 8'

6

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
35. Tear out non-salvageable tile floor & bag for disposal	126.00 SF	2.83	1.44	0.00	358.02	<0.00>	358.02
36. Tile floor covering	126.00 SF	10.22	30.16	263.58	1,581.46	<26.35>	1,555.11
37. Remove Additional labor to remove tile from concrete slab	126.00 SF	1.50	0.00	37.80	226.80	<0.00>	226.80
38. Floor leveling cement - Average	126.00 SF	2.43	7.18	62.68	376.04	<6.26>	369.78
39. R&R Ceramic/porcelain tile	368.00 SF	13.41	93.62	1,005.70	6,034.20	<89.38>	5,944.82
40. Tear out wet drywall, cleanup, bag, per LF - up to 2' tall	46.00 LF	2.81	0.86	0.00	130.12	<0.00>	130.12
41. 1/2" - drywall per LF - up to 2' tall	46.00 LF	6.57	3.26	61.10	366.58	<6.11>	360.47
42. R&R 1/2" Cement board	92.00 SF	4.80	7.01	89.72	538.33	<7.67>	530.66
43. R&R Interior door - solid core Colonist - pre-hung unit	1.00 EA	273.38	12.50	57.18	343.06	<5.39>	337.67
44. Seal & paint door slab only (per side)	2.00 EA	30.39	0.89	12.34	74.01	<1.24>	72.77
45. Seal & paint door/window trim & jamb - (per side)	2.00 EA	24.97	0.52	10.08	60.54	<1.01>	59.53
46. Lockset - Commercial grade - Detach & reset	1.00 EA	24.53	0.00	4.90	29.43	<0.49>	28.94
47. Toilet - Detach & reset	2.00 EA	218.37	0.64	87.46	524.84	<8.74>	516.10
48. R&R Toilet flange	2.00 EA	260.84	8.17	105.96	635.81	<8.72>	627.09
49. Toilet seat - Detach & reset	2.00 EA	35.04	0.00	14.02	84.10	<1.40>	82.70
50. Detach & Reset Sink - wall mounted	3.00 EA	218.89	0.00	131.34	788.01	<0.00>	788.01
51. P-trap assembly - Detach & reset	3.00 EA	53.78	0.00	32.26	193.60	<3.23>	190.37
52. R&R Baseboard electric heater - 4'	1.00 EA	140.13	2.70	28.58	171.41	<2.64>	168.77
80629_CHAWLA_HILLIS					10	/10/2018	Page:



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CONTINUED - Ladies'

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
53. Detach & Reset Toilet partition (plastic laminate or baked enamel steel)	3.00 EA	257.27	0.00	154.36	926.17	<0.00>	926.17
54. Soap dispenser - Detach & reset	2.00 EA	14.02	0.00	5.60	33.64	<0.56>	33.08
55. Toilet paper dispenser - Detach & reset	2.00 EA	29.49	0.00	11.80	70.78	<1.18>	69.60
56. Towel bar - Detach & reset	1.00 EA	15.49	0.00	3.10	18.59	<0.31>	18.28
57. Detach & Reset Handicap grab bar - Stainless steel, 1 1/2" x 48"	1.00 EA	30.67	0.00	6.14	36.81	<0.00>	36.81
58. Remove Fire alarm - Horn/Bell	1.00 EA	15.83	0.00	3.16	18.99	<0.00>	18.99
59. Install Fire alarm - Horn/Bell	1.00 EA	130.08	0.00	26.02	156.10	<2.60>	153.50
60. Detach & Reset Switch	1.00 EA	17.95	0.00	3.60	21.55	<0.00>	21.55
61. Muck-out/Flood loss cleanup	126.00 SF	1.62	0.00	0.00	204.12	<0.00>	204.12
62. Air mover (per 24 hour period) - No monitoring	5.00 EA	25.89	9.32	25.90	164.67	<2.75>	161.92

¹ air movers for 5 days

Started with 2 air movers on the first day as per FEMA Dry log memo, with decreasing of 50% of the equipment each day of the drying.

The drying time had to be increased due to drying taking longer do to the saturated framing member and sub flooring, and also due to the fact, that extensive porous materials retaining water. We conducted this operation within the IICRC S500 Standards of practice: Institute of Inspection, Cleaning, and Restoration Certification (IICRC).

63. Dehumidifier (per 24 hour period) - No	5.00 EA	52.13	15.64	0.00	276.29	<5.52>	270.77
monitoring							

¹ dehumidifier for 5 days. (Depend on SF of area and height of area)

The drying time had to be increased due to drying taking longer do to the saturated framing member and sub flooring, and also due to the fact, that extensive porous materials retaining water. We conducted this operation within the IICRC S500 Standards of practice: Institute of Inspection, Cleaning, and Restoration Certification (IICRC).

64. Negative air fan/Air scrubber (24 hr	5.00 DA	71.73	21.52	0.00	380.17	<7.60>	372.57
period) - No monit.							

1 air scrubber for 5 days

Using air scrubbers is within the IICRC S500 Standard and Reference Guide for Professional Water Damage Restoration.

The drying time had to be increased due to drying taking longer do to the saturated framing member and sub flooring, and also due to the fact, that extensive porous materials retaining water. We conducted this operation within the IICRC S500 Standards of practice: Institute of Inspection, Cleaning, and Restoration Certification (IICRC).

•							
65. Apply plant-based anti-microbial agent to the floor	126.00 SF	0.23	2.06	0.00	31.04	<0.63>	30.41
	00 00 00	0.50	4.40	0.00			
66. Clean stud wall - Heavy	92.00 SF	0.79	4.48	0.00	77.16	<1.54>	75.62
67. Mirror - plate glass - Detach & reset	24.00 SF	5.67	0.00	27.22	163.30	<2.72>	160.58
180629 CHAWLA HILLIS					10/10	0/2018	Page: 7



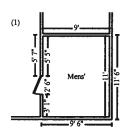
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CONTINUED - Ladies'

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
68. Remove Service sink - 24" x 20" - wall	1.00 EA	57.54	0.00	11.50	69.04	<0.00>	69.04
69. Install Service sink - 24" x 20" - wall hung	1.00 EA	324.44	0.00	64.88	389.32	<6.49>	382.83
Totals: Ladies'			221.97	2,347.98	15,554.10	200.53	15,353.57



1

Mens'

419.00 SF Walls & Ceiling

11.00 SY Flooring

320.00 SF Walls

40.00 LF Ceil. Perimeter

Height: 8'

99.00 SF Ceiling 99.00 SF Floor

40.00 LF Floor Perimeter

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
70. Tear out non-salvageable tile floor & bag for disposal	99.00 SF	2.83	1.13	0.00	281.30	<0.00>	281.30
71. Tile floor covering	99.00 SF	10.22	23.70	207.10	1,242.58	<20.71>	1,221.87
72. Remove Additional labor to remove tile from concrete slab	99.00 SF	1.50	0.00	29.70	178.20	<0.00>	178.20
73. Floor leveling cement - Average	99.00 SF	2.43	5.64	49.24	295.45	<4.92>	290.53
74. R&R Ceramic/porcelain tile	320.00 SF	13.41	81.41	874.52	5,247.13	<77.73>	5,169.40
75. Tear out wet drywall, cleanup, bag, per LF - up to 2' tall	11.00 LF	2.81	0.20	0.00	31.11	<0.00>	31.11
76. 1/2" - drywall per LF - up to 2' tall	11.00 LF	6.57	0.78	14.62	87.67	<1.47>	86.20
77. R&R 1/2" Cement board	22.00 SF	4.80	1.68	21.46	128.74	<1.83>	126.91
78. R&R Interior door - solid core Colonist - pre-hung unit	1.00 EA	273.38	12.50	57.18	343.06	<5.39>	337.67
79. Seal & paint door slab only (per side)	2.00 EA	30.39	0.89	12.34	74.01	<1.24>	72.77
80. Seal & paint door/window trim & jamb - (per side)	2.00 EA	24.97	0.52	10.08	60.54	<1.01>	59.53
81. Lockset - Commercial grade - Detach & reset	1.00 EA	24.53	0.00	4.90	29.43	<0.49>	28.94
82. R&R Baseboard electric heater - 4'	1.00 EA	140.13	2.70	28.58	171.41	<2.64>	168.77
83. Toilet - Detach & reset	1.00 EA	218.37	0.32	43.74	262.43	<4.38>	258.05
80629_CHAWLA_HILLIS					10	/10/2018	Page: 8



Corporate Headquarters

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CONTINUED - Mens'

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
84. R&R Toilet flange	1.00 EA	260.84	4.09	52.98	317.91	<4.36>	313.55
85. Toilet seat - Detach & reset	1.00 EA	35.04	0.00	7.00	42.04	<0.70>	41.34
86. Detach & Reset Urinal - wall hung	1.00 EA	316.39	0.00	63.28	379.67	<0.00>	379.67
87. Detach & Reset Sink - wall mounted	3.00 EA	218.89	0.00	131.34	788.01	<0.00>	788.01
88. P-trap assembly - Detach & reset	3.00 EA	53.78	0.00	32.26	193.60	<3.23>	190.37
89. Detach & Reset Handicap grab bar - Stainless steel, 1 1/2" x 48"	3.00 EA	30.67	0.00	18.40	110.41	<0.00>	110.41
90. Towel bar - Detach & reset	1.00 EA	15.49	0.00	3.10	18.59	<0.31>	18.28
91. Soap dispenser - Detach & reset	2.00 EA	14.02	0.00	5.60	33.64	<0.56>	33.08
92. Toilet paper holder - Detach & reset	1.00 EA	16.35	0.00	3.28	19.63	<0.33>	19.30
93. Toilet paper dispenser - Detach & reset	2.00 EA	29.49	0.00	11.80	70.78	<1.18>	69.60
94. Mirror - plate glass - Detach & reset	9.00 SF	5.67	0.00	10.20	61.23	<1.02>	60.21
95. Detach & Reset Switch	1.00 EA	17.95	0.00	3.60	21.55	<0.00>	21.55
96. Detach & Reset Ground fault interrupter (GFI) outlet	1.00 EA	17.95	0.00	3.60	21.55	<0.00>	21.55
97. Remove Fire alarm - Horn/Bell	1.00 EA	15.83	0.00	3.16	18.99	<0.00>	18.99
98. Install Fire alarm - Horn/Bell	1.00 EA	130.08	0.00	26.02	156.10	<2.60>	153.50
99. Detach & Reset Toilet partition (plastic laminate or baked enamel steel)	1.00 EA	257.27	0.00	51.46	308.73	<0.00>	308.73
100. Detach & Reset Urinal partition (plastic laminate or baked enamel steel)	1.00 EA	76.66	0.00	15.34	92.00	<0.00>	92.00
101. Muck-out/Flood loss cleanup	99.00 SF	1.62	0.00	0.00	160.38	<0.00>	160.38
102. Air mover (per 24 hour period) - No monitoring	5.00 EA	25.89	9.32	25.90	164.67	<2.75>	161.92

1 air movers for 5 days

Started with 2 air movers on the first day as per FEMA Dry log memo, with decreasing of 50% of the equipment each day of the drying.

The drying time had to be increased due to drying taking longer do to the saturated framing member and sub flooring, and also due to the fact, that extensive porous materials retaining water. We conducted this operation within the IICRC S500 Standards of practice: Institute of Inspection, Cleaning, and Restoration Certification (IICRC).

_							
103. Dehumidifier (per 24 hour period) -	5.00 EA	52.13	15.64	0.00	276.29	<5.52>	270.77
No monitoring							

1 dehumidifier for 5 days. (Depend on SF of area and height of area)

The drying time had to be increased due to drying taking longer do to the saturated framing member and sub flooring, and also due to the fact, that extensive porous materials retaining water. We conducted this operation within the IICRC S500 Standards of practice: Institute of Inspection, Cleaning, and Restoration Certification (IICRC).

104. Negative air fan/Air scrubber (24 hr period) - No monit.	5.00 DA	71.73	21.52	0.00	380.17	<7.60>	372.57

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Totals: Mens'

Hillis Adjustment Agency Inc.

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CONTINUED - Mens'

DESCRIPTION	QUANTITY UNIT	PRICE	TAX	O&P	RCV	DEPREC.	ACV
1 air scrubbers for 5 days							
Using air scrubbers is within the IICRC S Professional Water Damage Restoration.	500 Standard and Refere	ence Guide fo	or				
The drying time had to be increased due to extensive porous materials retaining water Cleaning, and Restoration Certification (I	r. We conducted this ope						
105. Apply plant-based anti-microbial agent to the floor	99.00 SF	0.23	1.62	0.00	24.39	<0.49>	23.90
106. Clean stud wall - Heavy	22.00 SF	0.79	1.07	0.00	18.45	<0.37>	18.08

184.73

1,821.78

12,111.84

152.83

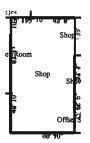
11,959.01



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7544.83 SF Walls
15511.33 SF Walls & Ceiling
885.17 SY Flooring

333.83 LF Ceil. Perimeter

7966.50 SF Ceiling 7966.50 SF Floor 313.83 LF Floor Perimeter

Height: 23'

Height: 23'

Missing Wall - Goes to Floor Missing Wall - Goes to Floor 10' X 6' 8" 10' X 6' 8"

Subroom: Shop_offset (1)

Opens into STORAGE _AREA

1874.50 SF Walls 2700.00 SF Walls & Ceiling

> 91.72 SY Flooring 81.50 LF Ceil. Perimeter

825.50 SF Ceiling 825.50 SF Floor

81.50 LF Floor Perimeter

Missing Wall

39' X 23'

Opens into SHOP

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
107. Tear out wet drywall, cleanup, bag for disposal	500.00 SF	0.85	4.50	0.00	429.50	<0.00>	429.50
108. 1/2" drywall - hung, taped, floated, ready for paint	500.00 SF	1.70	15.60	173.12	1,038.72	<17.31>	1,021.41
109. Tear out wet paneling, bag for disposal	400.00 SF	0.48	1.92	0.00	193.92	<0.00>	193.92
110. Paneling	400.00 SF	2.08	15.84	169.56	1,017.40	<16.96>	1,000.44
111. Seal/prime then paint the surface area twice (3 coats)	800.00 SF	1.04	12.00	168.80	1,012.80	<16.88>	995.92
112. Paint sheet metal - two coats	1,600.00 SF	0.79	28.80	258.56	1,551.36	<25.86>	1,525.50
113. Muck-out/Flood loss cleanup	8,792.00 SF	1.62	0.00	0.00	14,243.04	<0.00>	14,243.04
114. Air mover (per 24 hour period) - No monitoring	110.00 EA	25.89	205.04	569.58	3,622.52	<60.38>	3,562.14



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CONTINUED - Shop

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
22 air movers for 5 days							
Started with 55 air movers on the first day	as per FEMA D	ry log memo, with	decreasing of 50	0% of the equ	ipment each d	lay of the drying	g .
The drying time had to be increased due to extensive porous materials retaining water. Cleaning, and Restoration Certification (III	We conducted						
115. Dehumidifier (per 24 hour period) - No monitoring	290.00 EA	52.13	907.06	0.00	16,024.76	<320.49>	15,704.27
58 dehumidifiers for 5 days. (Depend on S	F of area and he	eight of area)					
The drying time had to be increased due to extensive porous materials retaining water. Cleaning, and Restoration Certification (III	We conducted	onger do to the satu this operation with	rated framing min the IICRC S5	nember and su 00 Standards	ab flooring, an of practice: In	d also due to the estitute of Inspec	e fact, that ction,
116. Negative air fan/Air scrubber (24 hr period) - No monit.	290.00 DA	71.73	1,248.10	0.00	22,049.80	<440.99>	21,608.81
58 air scrubbers for 5 days							
Using air scrubbers is within the IICRC SS Professional Water Damage Restoration.	00 Standard and	d Reference Guide	for				
The drying time had to be increased due to extensive porous materials retaining water. Cleaning, and Restoration Certification (III	We conducted						

0.23

0.79

143.70

24.34

2,606.90

0.00

0.00

1,339.62

2,165.86

419.34

63,769.02

<43.31>

<8.38>

950.56

8,792.00 SF

500.00 SF

180629_CHAWLA_HILLIS

117. Apply plant-based anti-microbial

118. Clean stud wall - Heavy

agent to the floor

Totals: Shop

2,122.55

410.96

62,818.46



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Storage Area/Room

Height: 23'

4349.33	SF Walls
5692.33	SF Walls & Ceiling
149.22	SY Flooring
192.00	LF Ceil. Perimeter

1343.00 SF Ceiling 1343.00 SF Floor 182.00 LF Floor Perimeter

Missing	Wall	- Goes	to	Floor
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10' X 6' 8"

Opens into SHOP

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
119. Clean masonry	158.00 SF	0.48	4.75	0.00	80.59	<1.61>	78.98
120. Seal block with masonry sealer	158.00 SF	0.69	2.65	22.34	134.01	<2.23>	131.78
121. Waterproof concrete & masonry paint	158.00 SF	1.23	5.02	39.86	239.22	<3.99>	235.23
122. Clean more than the room length	1,817.00 SF	0.26	29.50	0.00	501.92	<10.04>	491.88
123. Paint sheet metal - two coats	1,817.00 SF	0.79	32.71	293.62	1,761.76	<29.36>	1,732.40
124. Muck-out/Flood loss cleanup	1,343.00 SF	1.62	0.00	0.00	2,175.66	<0.00>	2,175.66
125. Air mover (per 24 hour period) - No monitoring	20.00 EA	25.89	37.28	103.56	658.64	<10.98>	647.66

⁴ air movers for 5 days

Started with 9 air movers on the first day as per FEMA Dry log memo, with decreasing of 50% of the equipment each day of the drying.

The drying time had to be increased due to drying taking longer do to the saturated framing member and sub flooring, and also due to the fact, that extensive porous materials retaining water. We conducted this operation within the IICRC S500 Standards of practice: Institute of Inspection, Cleaning, and Restoration Certification (IICRC).

126. Dehumidifier (per 24 hour period) -	45.00 EA	52.13	140.75	0.00	2,486.60	<49.74>	2,436.86
No monitoring					,		ŕ

⁹ dehumidifiers for 5 days. (Depend on SF of area and height of area)

The drying time had to be increased due to drying taking longer do to the saturated framing member and sub flooring, and also due to the fact, that extensive porous materials retaining water. We conducted this operation within the IICRC S500 Standards of practice: Institute of Inspection, Cleaning, and Restoration Certification (IICRC).

127. Negative air fan/Air scrubber (24 hr	45.00 DA	71.73	193.67	0.00	3,421.52	<68.43>	3,353.09
period) - No monit.							

⁹ air scrubbers for 5 days

Using air scrubbers is within the IICRC S500 Standard and Reference Guide for Professional Water Damage Restoration.

The drying time had to be increased due to drying taking longer do to the saturated framing member and sub flooring, and also due to the fact, that extensive porous materials retaining water. We conducted this operation within the IICRC S500 Standards of practice: Institute of Inspection, Cleaning, and Restoration Certification (IICRC).



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CONTINUED - Storage Area/Room

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
128. Apply plant-based anti-microbial agent to the floor	1,343.00 SF	0.23	21.95	0.00	330.84	<6.61>	324.23
Totals: Storage Area/Room			468.28	459.38	11,790.76	182.99	11,607.77
Total: Main Level			6,490.82	32,072.16	278,356.31	2,627.49	275,728.82
Gener	al						
DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
129. Water Extraction & Remediation Technician - per hour	12.50 HR		34.60	0.00	611.23	<0.00>	611.23
15 mins of technician time per hour of run	time to maintair	n generator.					
130. Add for personal protective equipment (hazardous cleanup)	40.00 EA	10.29	43.03	0.00	454.63	<0.00>	454.63
131. Equipment setup, take down, and monitoring (hourly charge)	76.40 HR	46.13	211.46	0.00	3,735.79	<0.00>	3,735.79
5 min per unit@day							
132. Generator - 6,000 watt - portable (per day)			0.00	77.44	464.64	<0.00>	464.64
The structure had no available power due to inspection can be attained.	o electoral dama	ige during flooding	g. The city had	d removed pow	ver from the bui	ilding until occ	upancy
133. Temporary Repairs (Bid Item)	50.00 EA	1.99	0.00	19.90	119.40	<0.00>	119.40
10 gallons of diesel per day for 5 days \$ 1.9	99						
134. Delivery charge (Bid Item)	2.00 EA	155.00	0.00	62.00	372.00	<0.00>	372.00
Delivery of generator. \$ 155							
135. Delivery charge (Bid Item)	1.00 EA	50.00	0.00	10.00	60.00	<0.00>	60.00
Delivery of fuel. \$ 50							
136. Power distribution box	5.00 DA	37.14	11.14	0.00	196.84	<0.00>	196.84
1 unit for 5 days							
137. Generator temporary power cable (peweek)	r 1.00 Wk	79.95	0.00	16.00	95.95	<0.00>	95.95
138. Dumpster load - Approx. 40 yards, 7-8 tons of debris	2.00 EA	929.00	0.00	0.00	1,858.00	<0.00>	1,858.00
139. Cleaning & Remediation - Supervisory - per hr	8.00 HR	50.01	24.00	0.00	424.08	<0.00>	424.08



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CONTINUED - General

DESCRIPTION	QUANTITY UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
Totals: General		324.23	185.34	8,392.56	0.00	8,392.56
Line Item Totals: 180629_CHAWLA_H	IILLIS	6,815.05	32,257.50	286,748.87	2,627.49	284,121.38



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Summary for Building

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Line Item Total	247,676.32
Permit 1% of Coverage	2,867.49
Unforeseen expenses 2% of Coverage	5,734.98
Material Sales Tax	2,475.34
Cleaning Mtl Tax	66.97
Subtotal	258,821.10
Overhead	16,989.00
Profit	16,989.00
Cleaning Sales Tax	4,272.74
Replacement Cost Value	\$297,071.84
Less Non-recoverable Depreciation	<2,627.49>
Actual Cash Value	\$294,444.35
Less Deductible	(5,000.00)
Net Claim	\$289,444.35

Don Martin



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Recap of Taxes, Overhead and Profit

	Overhead (10%)	Profit (10%)	Material Sales Tax (6%)	Cleaning Mtl Tax (6%)	Cleaning Sales Tax (6%)	Clothing Acc Tax (6%)	Manuf. Home Tax (6%)	Storage Rental Tax (6%)
Line Ite	ems							
	16,128.75	16,128.75	2,475.34	66.97	4,272.74	0.00	0.00	0.00
Additio	nal Charges							
	860.25	860.25	0.00	0.00	0.00	0.00	0.00	0.00
Total	······································							
	16,989.00	16,989.00	2,475.34	66.97	4,272.74	0.00	0.00	0.00

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Recap by Room

Estimate: 180629_CHAWLA_HILLIS

Area: Main Level	39,217.08	15.83%
Show Room	106,801.17	43.12%
Ladies'	12,984.15	5.24%
Mens'	10,105.33	4.08%
Shop	59,822.50	24.15%
Storage Area/Room	10,863.10	4.39%
Area Subtotal: Main Level	239,793.33	96.82%
General	7,882.99	3.18%
Subtotal of Areas	247,676.32	100.00%
Total	247,676.32	100.00%



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Recap by Category with Depreciation

O&P Items	RCV	Deprec.	ACV
CONTENT MANIPULATION	614.36	12.29	602.07
GENERAL DEMOLITION	10,563.79		10,563.79
DOORS	1,387.40	27.75	1,359.65
DRYWALL	2,209.99	44.20	2,165.79
ELECTRICAL	45,895.14	5.18	45,889.96
ELECTRICAL - SPECIAL SYSTEMS	260.16	5.20	254.96
FLOOR COVERING - STONE	28,725.19	574.50	28,150.69
FLOOR COVERING - CERAMIC TILE	6,380.54	127.61	6,252.93
PERMITS AND FEES	360.00		360.00
FINISH CARPENTRY / TRIMWORK	190.98	3.82	187.16
FINISH HARDWARE	201.53	4.03	197.50
FRAMING & ROUGH CARPENTRY	4,146.65	82.93	4,063.72
MASONRY	21,082.66		21,082.66
MIRRORS & SHOWER DOORS	187.11	3.74	183.37
PLUMBING	3,679.44	40.99	3,638.45
PANELING & WOOD WALL FINISHES	832.00	16.64	815.36
PAINTING	17,275.89	251.66	17,024.23
TOILET & BATH ACCESSORIES	1,346.38	2.36	1,344.02
TILE	8,646.58	172.94	8,473.64
TEMPORARY REPAIRS	566.65		566.65
WATER EXTRACTION & REMEDIATION	4,271.85	85.45	4,186.40
O&P Items Subtotal	158,824.29	1,461.29	157,363.00
Non-O&P Items	RCV	Deprec.	ACV
CLEANING	8,912.15	30.88	8,881.27
GENERAL DEMOLITION	22,832.81		22,832.81
WATER EXTRACTION & REMEDIATION	57,107.07	1,032.83	56,074.24
Non-O&P Items Subtotal	88,852.03	1063.71	87,788.32
O&P Items Subtotal	158,824.29	1,461.29	157,363.00
Permits and Fees	8,602.47		8,602.47
Material Sales Tax	2,475.34	32.89	2,442.45
Cleaning Mtl Tax	66.97	0.61	66.36
Overhead Profit	16,989.00		16,989.00
Cleaning Sales Tax	16,989.00 4,272.74	68.99	16,989.00 4,203.75
Total	297,071.84	2,627.49	294,444.35

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4-20180926_103133





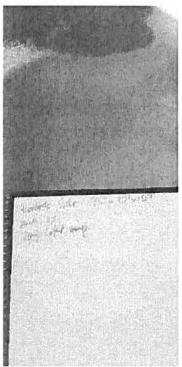
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5 5-20180926_103145



6 6-20180926_115003





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7 7-20180926 115012



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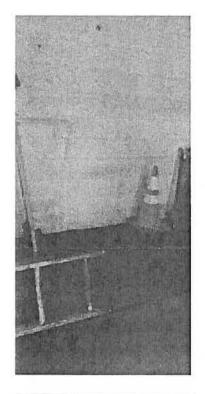




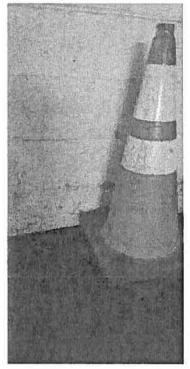
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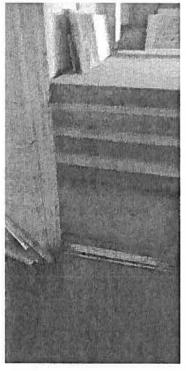
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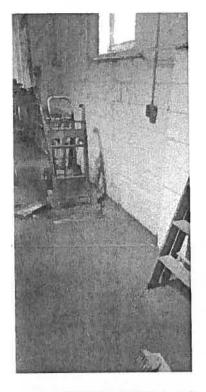




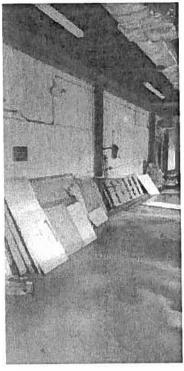
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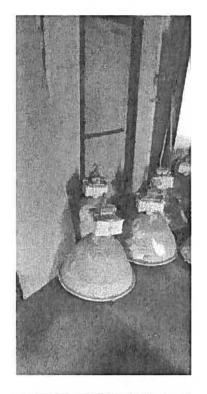




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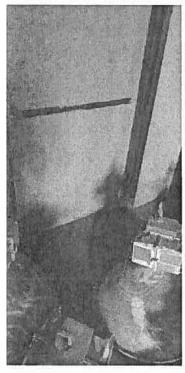
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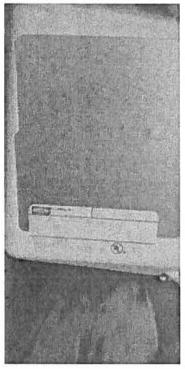
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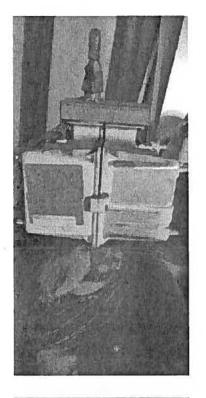




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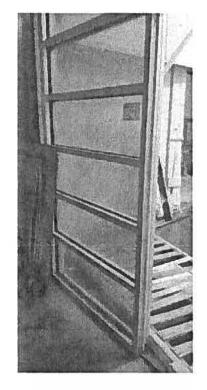




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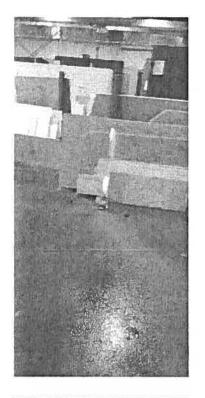


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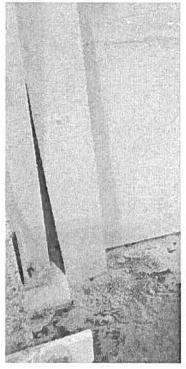
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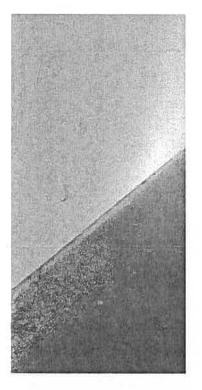




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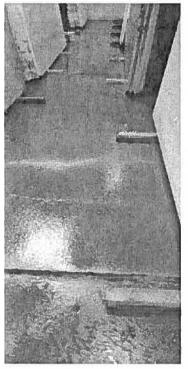
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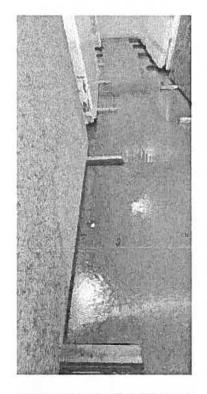




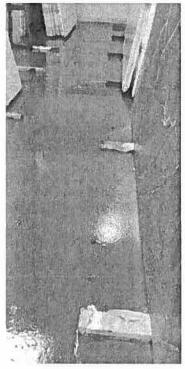
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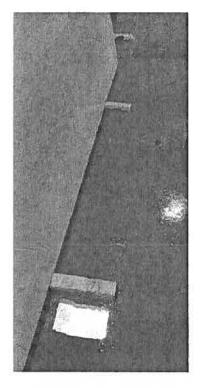




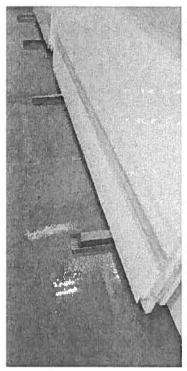
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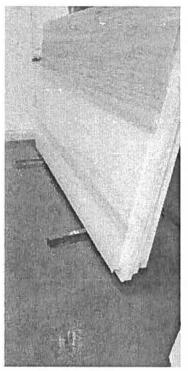
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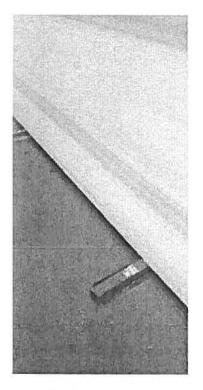




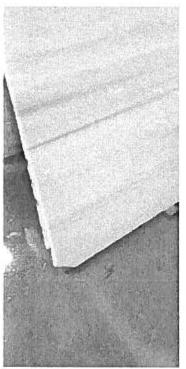
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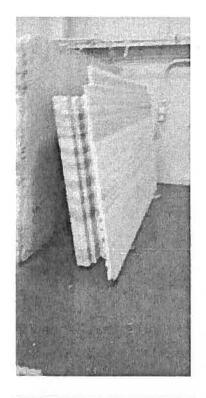




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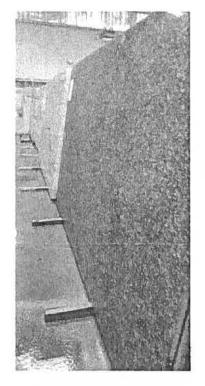




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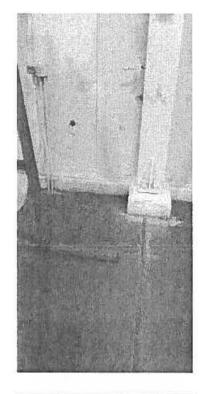




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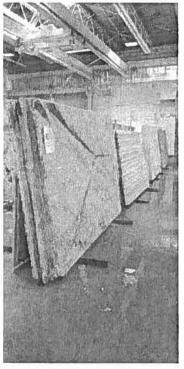
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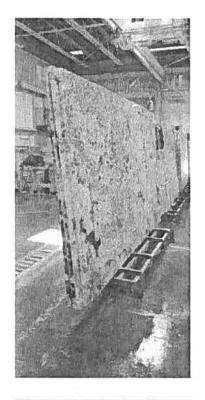




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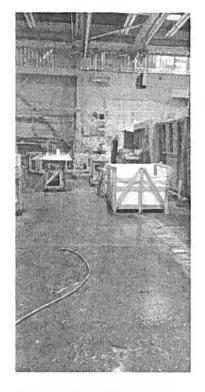




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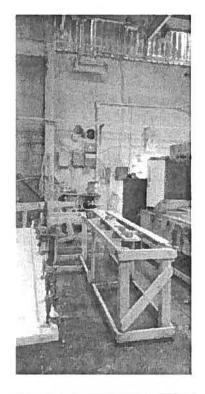




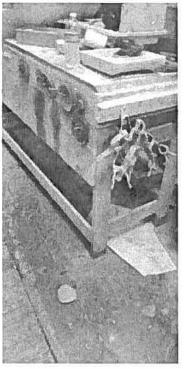
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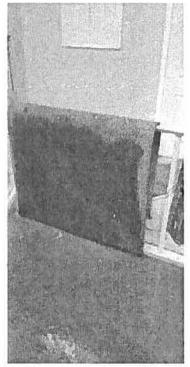
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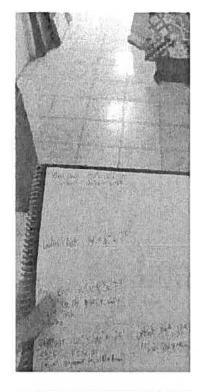




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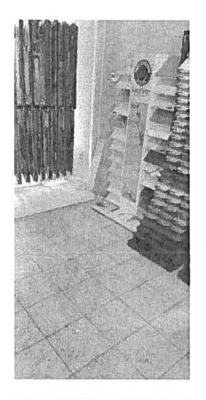




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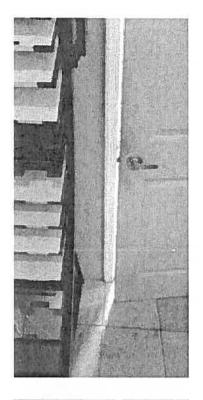




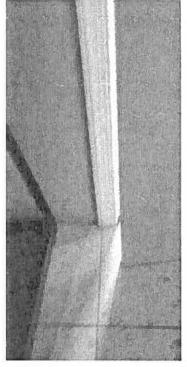
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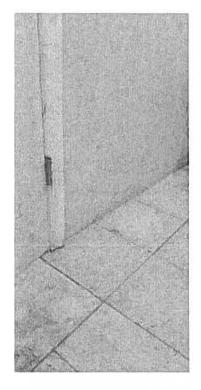




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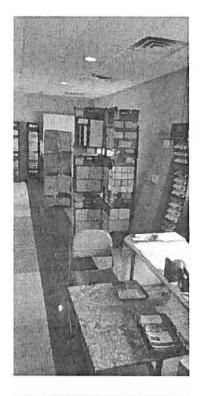


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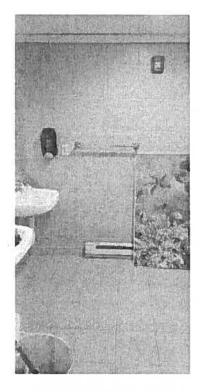




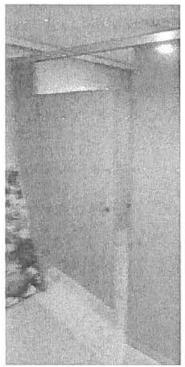
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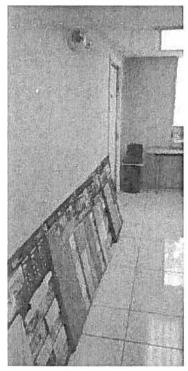
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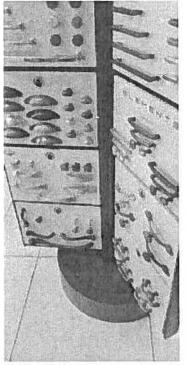
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105 105-20180926_120048



106 106-20180926_120102





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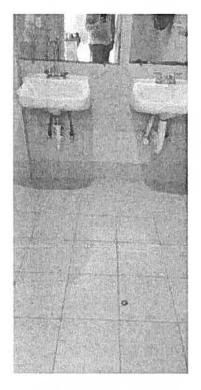




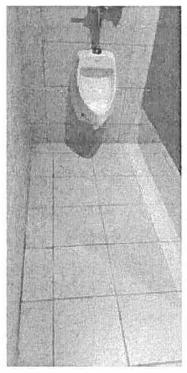
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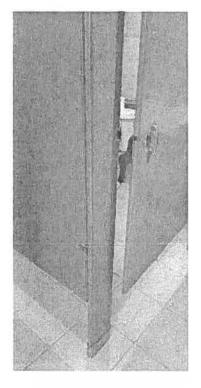




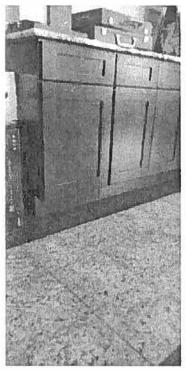
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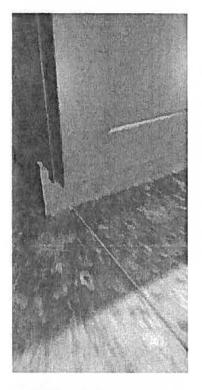




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114 114-20180926_120651

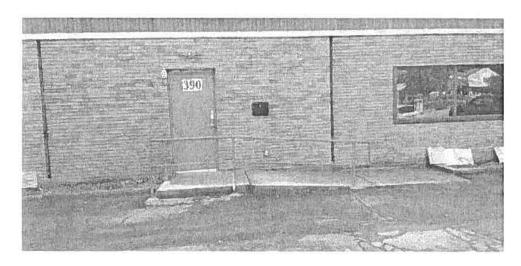




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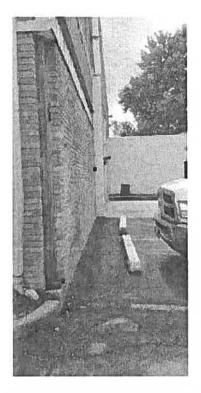




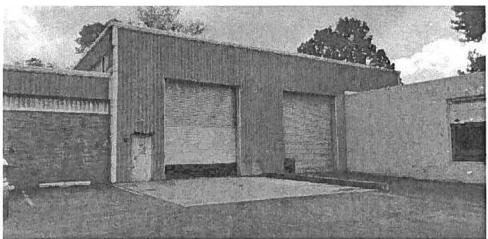
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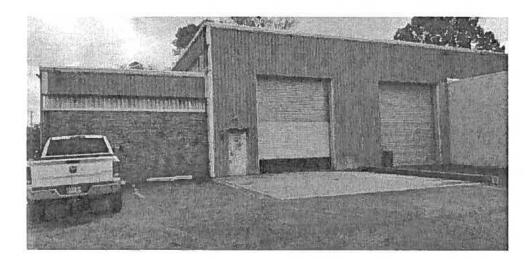




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